

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Richmond Division)**

In re:

LeClairRyan PLLC,<sup>1</sup>

Debtor.

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Lynn L. Tavenner, as Chapter 7 Trustee,

Plaintiff,

v.

ULX Partners, LLC and UnitedLex Corporation,

Defendants.

Chapter 7

Case No. 19-34574 (KRH)

Adv. Proc. No. 20-03142 (KRH)

**NOTICE OF MOTION AND NOTICE OF HEARING**

PLEASE TAKE NOTICE that Lynn L. Tavenner, Chapter 7 Trustee (the “**Trustee**”), and not individually but solely in her capacity as the Chapter 7 trustee of the bankruptcy estate of LeClairRyan PLLC, in the above-captioned Chapter 7 case (the “**Case**”), by counsel, has filed the *Motion For Entry of an Order Authorizing The Trustee to File Redactions and Documents Under Seal In Connection With Trustee’s Motion for Leave to Amend Complaint* (the “**Motion**”). A copy of the Motion is being served herewith.

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<sup>1</sup> The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor’s federal tax identification number are 2451.

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*Special Counsel to Lynn L. Tavenner, Chapter 7 Trustee*

**PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Motion carefully and discuss it with your attorney if you have one in this Case. (If you do not have an attorney, you may wish to consult one).**

**PLEASE TAKE FURTHER NOTICE** that on September 4, 2019, the Court entered the *Order Establishing Certain Notice, Case Management and Administrative Procedures* [ECF No. 38] (the “**Case Management Order**”), which approved the Notice, Case Management, and Administrative Procedures attached as Exhibit 1 to the Case Management Order (the “**Case Management Procedures**”). The Case Management Procedures, among other things, prescribe the manner in which Objections must be filed and served and set forth when certain hearings will be conducted. A copy of the Case Management Order may be obtained, free of charge, by written request to pberan@tb-lawfirm.com or, for a fee, at <https://ecf.vaeb.uscourts.gov>.

**PLEASE TAKE FURTHER NOTICE** if you do not want the Court to grant the relief requested in the Motion, or if you want the Court to consider your views on the Motion, then, by **August 16, 2021** (the “**Objection Deadline**”), you or your attorney must:

File with the Court, either electronically or at the address shown below, a written response to the Motion pursuant to Rule 9013-1(H) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the Case Management Procedures. If you mail your written response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the Objection Deadline.

**If a response is not properly and timely filed and served, the Court may deem any opposition waived, treat the Motion as conceded and enter the appropriate order granting the requested relief without further notice or hearing.**

Clerk of the Court  
United States Bankruptcy Court  
701 East Broad Street, Suite 4000  
Richmond, VA 23219

In accordance with the Case Management Procedures, you must also serve a copy of your written Objection on the Core Parties, the 2002 List Parties and any Affected Entity so that the Objection is received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE THAT** the Court will entertain the Motion at the upcoming omnibus hearing on **August 19, 2021, at 11:00 a.m.** (or such time thereafter as the matter may be heard). In connection with the same, the undersigned will appear before The Honorable Kevin R. Huennkens, United States Bankruptcy Judge. Due to the COVID-19 public health emergency, no in-person hearings are being held. This hearing will take place remotely through Zoom on the date and time scheduled herein. To appear at the hearing, you must use the following Zoom registration link:

<https://www.zoomgov.com/meeting/register/vJItcuyurT4uGUza77r1a7XmQbZhJCVxE1M>

You can also dial in through the listen-only conference line:

Dial: 1-866-590-5055  
Access Code: 4377075  
Security Code: 81921

**PLEASE TAKE FURTHER NOTICE THAT** you should consult the Case Management Procedures before filing any written response.

**PLEASE GOVERN YOURSELVES ACCORDINGLY.**

Dated: August 5, 2021

Respectfully submitted,

/s/ Erika L. Morabito  
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*Special Counsel to Lynn L. Tavenner, the Chapter 7  
Trustee of the Estate of LeClairRyan PLLC*

**CERTIFICATE OF SERVICE**

Pursuant to the Local Rules of this Court, I certify that on this 5th day of August 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all ECF registrants in this case. I further certify that I will serve a true copy of the foregoing electronically and/or by first-class mail to (i) counsel for Defendants; (ii) the parties and/or counsel for the proposed additional defendants named in the amended complaint; and (iii) the Office of the United States Trustee.

/s/ Erika Morabito

Erika L. Morabito

*Special Counsel to Lynn L. Tavenner,  
the Chapter 7 Trustee of the Estate of  
LeClairRyan PLLC*